

REMARKS

Applicants have thoroughly considered the October 12, 2007 Office action. Amendment C amends claims 1, 8-9, 11-14, 17 and 20 for clarification purposes and cancels the withdrawn claims 26-40. Therefore, claims 1-25 are for consideration in this Amendment C. Applicants respectfully request that favorable reconsideration of the application in light of the following remarks and the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance.

Claim Rejection under 35 U.S.C. §102(e)

Claims 1-25 stand rejected under 35 U.S.C. §102(e) as being anticipated by US Patent No. 7,127,460 to Nixon et al. Applicants respectfully submit that Nixon fails to disclose each and every element of the rejected claims.

As an overview, Applicants respectfully submit that Nixon discloses a distributed configuration database having components thereof spread over or throughout the different geographical portions of a process control system such that configuration information that is pertinent to one location is stored locally and is accessed over a local area network while configuration information that is not pertinent to the particular location is accessed via a slower connection. See also Nixon, col. 4, lines 36-53. Nixon further teaches a concept of a briefcase database as described in cols. 11-14 and FIGS. 3 and 5. In short, Nixon discloses a master configuration database that contains **all of the configuration data for all of the sites of a process control system**. Nixon then specifically discloses a briefcase database stored at the remote site that stores a copy of some or all of the configuration data within the master configuration database to be used at the remote site. In other words, the main site or the location of the master configuration database does not have a copy of the briefcase database.

To the contrary, amended claim 1 recites, in part, “receiving a request from a user to implement a change in configuration data, said configuration data defining an operation of a client, **said configuration data being stored in configuration databases at one or more locations, each of said configuration databases at each location including a write partition and replicas of the write partition, wherein a part of the replicas of the write partition for each of said configuration databases is additionally stored at another location**; storing the received request in a memory area **of the configuration databases at a first location**;

requesting topology data from the **write partition of the memory area at the first location** based on the configuration data, said topology data defining a relationship between the client and the configuration data; receiving the requested topology data from the memory area, said received topology data identifying the client in response to the received request from the user; identifying a notification service **at the first location of the memory area** associated with the identified client....”

Aspects of the invention provide a unified system for managing a plurality of clients through effective management of configuration data. For example, configuration data is stored in configuration databases each having a number of partitions and replicas. One of the partitions is a write partition for storing the topology data. Each of the configuration databases also includes replicas of the write partition. In addition, each location of the configuration databases includes a part of the replicas of the write partition from another location. Coupled with a notification status database and/or notification server at each location, aspects of the invention enable a management of configuration data that sends notification to location when there is a change to the configuration data at another location. See also FIG. 1 and paragraphs [0034-36].

Applicants respectfully submit that Nixon fails employ such arrangement and that Nixon teaches away from this management scheme by specifically disclosing that there is a main location of a master database with a plurality of briefcase databases at various locations. While the briefcase databases may be considered as copies of the master database, Nixon fails to disclose or suggest that the master database and/or the location of the master database includes a copy of other briefcase databases. To the contrary and as amended, aspects of the invention include the features that **wherein a part of the replicas of the write partition for each of said configuration databases is additionally stored at another location.**” Hence, for at least the reasons above, Applicants respectfully submit that Nixon could not anticipate aspects of the invention.

Furthermore, Applicants respectfully submit that Nixon fails to disclose or suggest the claimed feature in amended claim 8, which recites, “...further comprising searching a second memory area at a second location to determine if the notification service notified the client of the change in configuration data, said second memory area storing a configuration database with a write partition and replicas of the write partition, said second memory area additionally storing a part of replicas of configuration databases at another location.”

Therefore, Applicants respectfully submit that Nixon fails to disclose each and every element of the rejected claims. Hence, claim 1 and its dependent claims 2-10 are patentable. Hence, the rejection of claims 1-10 under 35 U.S.C. §102(e) should be withdrawn.

Similarly, amended claim 11 recites, in part, “receiving a request from a user to implement the change in configuration data, **said configuration data being stored in a configuration database at a first location, said configuration database being one of a plurality of configuration databases at one or more locations, each of said configuration databases at each location including a write partition and replicas of the write partition, wherein a part of the replicas of the write partition for each of said configuration databases is additionally stored at another location;** receiving a notification associated with the **configuration databases at the first location**, said notification indicating the change in configuration data, said configuration data defining an operation of the client; obtaining a notification manifest from a memory area **at the first location** in response to the received notification, said notification manifest defining the change in the configuration data and specifying the client in response to the received user request....” For at least the reasons above, Applicants respectfully submit that the rejected claims 11-16 are patentable over the cited art and the amended aspects are fully supported by the Application. Therefore, the rejection of claims 11-16 under 35 U.S.C. §102(e) should be withdrawn.

Moreover, amended claim 17 recites, in part, “...receiving a request from a user to implement a change in configuration data, said configuration data defining an operation of a client, **said configuration data being stored in a configuration database at a first location, said configuration database being one of a plurality of configuration databases at one or more locations, each of said configuration databases at each location including a write partition and replicas of the write partition, wherein a part of the replicas of the write partition for each of said configuration databases is additionally stored at another location;** receiving a notification manifest from a notification service **associated with the configuration databases at the first location**, said received notification manifest defining a change in configuration data and specifying a client affected by the change in the configuration data in response to the received user request....” Applicants respectfully submit that Nixon fails to disclose or suggest at least the features of having “**each of said configuration databases at each location including a write partition and replicas of the write partition, wherein a part of the replicas of the write partition for each of said configuration databases is additionally stored**

at another location.” Therefore, amended claim 17 is distinguishable over the cited art and the rejection of claims 17-25 under 35 U.S.C. §102(e) should be withdrawn.

Applicants submit that the claims are allowable for at least the reasons set forth herein. Applicants thus respectfully submit that claims 1-25 as presented are in condition for allowance and respectfully request favorable reconsideration of this application.

Although the prior art made of record and not relied upon may be considered pertinent to the disclosure, none of these references anticipates or makes obvious the recited aspects of the invention. The fact that Applicants may not have specifically traversed any particular assertion by the Office should not be construed as indicating Applicants' agreement therewith.

Applicants wish to expedite prosecution of this application. If the Examiner deems the application to not be in condition for allowance, the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the application in condition for allowance.

The Commissioner is hereby authorized to charge any deficiency or overpayment of any required fee during the entire pendency of this application to Deposit Account No. 19-1345.

Respectfully submitted,

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